



Department of Health and Environment

September 9, 1993

Robert C. Harder, Secretary

Mr. Steven M. Keiter
Facility Manager
Hydrocarbon Recyclers, Inc.
2549 North New York
Wichita, Kansas 67219

Re: Hazardous Waste Compliance Inspection
EPA Identification Number KSD007246846

Dear Mr. Keiter:

I have reviewed the response letter dated August 23, 1993, from Mr. Ron Robertson, Facility Compliance Officer, which addresses the one violation cited during my June 30, 1993 inspection and which also addresses a number of concerns regarding your facility.

Based on the information contained in the response, your facility is now considered in compliance to state hazardous waste regulations relative to the inspection.

Additional Comment

The regulatory status of the scrap metal tank system located in area D400 of building D has been appropriately addressed by Mr. Steve Broslavick, Hazardous Waste Section, KDHE, Topeka. Mr. Broslavick's letter addressed to you and dated September 3, 1993 provides the department's interpretation of the status of the system and the regulatory requirements for the system.

This issue was inadvertently omitted from the additional comments section of my original inspection letter dated July 29, 1993. Mr. Broslavick's letter will be filed as an addendum to the inspection of June 30, 1993.

Thank you for your cooperation with the hazardous waste management program. If you have any questions regarding the inspection or this letter, call me at (316) 838-1071.

Respectfully,

A handwritten signature in cursive script, appearing to read "Gilbert L. Perez".

Gilbert L. Perez
Waste Programs Section
Bureau of District Operations

GLP:HRI93.Fin

pc: John Mitchell, BWM, Topeka
Ron Smith, BWM, Topeka ✓
SCD File



R00001191

RCRA Records Center



A Subsidiary of
Union Pacific Corporation

Treatment & Recovery Services

Gilbert L. Perez
Waste Management Programs
Bureau of District Operations
Kansas Department of Health and Environment

August 23, 1993

Re: Hazardous Waste Compliance Inspection on June 30, 1993

Dear Mr. Perez:

Your letter of July 29 indicated the following issue of alleged non compliance:

Land Disposal Restriction (LDR) Notice. the LDR associated with Manifest #02877 dated April 13, 1993, did not display the manifest document number as required by 40 CFR 268.7, as referenced by K.A.R. 28-31-14. *OK*

This deficiency was corrected on June 30, 1993. *OK*

Specific training and document review procedures have been implemented to ensure that LDR forms display the associated manifest document number. *✓*

In response to your additional comments:

Documentation has been received from the generators removing the incorrect Waste Number U151 from metallic Mercury wastes stored at this facility. This material was shipped to an approved facility for disposal today, August 23. *OK sec. 104*

Per our discussion on June 30, facility inspectors have been instructed to sign their full name on the first page of each inspection log, and may sign or initial subsequent pages. *OK*

Tank 15C has been repaired, and is in the process of certification in accordance with applicable regulations. *OK*

New construction in buildings I and J is progressing on schedule. We will notify Mr. Broslavick as completion times approach. *OK*

Sincerely,

Ronald Robertson
Facility Compliance Officer



ary of
Pacific Corporation

atment & Recovery Services

January 8, 1993

Teresa Hansen
Inspection and Enforcement Section
Bureau of Waste Management
Kansas Department of Health and Environment
South Central District Office
1919 N. Amidon, Suite 130
Wichita, KS 67203

Re: Hydrocarbon Recyclers, Inc. of Wichita (HRIW) Disposal of Mercury Waste

Dear Ms. Hansen

Your letter dated December 16, 1992 makes reference to mercury wastes stored at our facility. As you know, very few outlets exist which manage elemental mercury wastes, thus disposal is rather difficult. One such permitted and approved recycling outlet is Bethlehem Apparatus of Bethlehem, Pennsylvania. Unfortunately, according to Bethlehem's state approval, they are not permitted to handle the listed waste code, U151, and accept only characteristic D009 wastes.

Certain wastes in storage at HRIW have been classified as both U151 and D009, although the use of the "U" listing is questionable in light of the source of generation. Regardless, the generator insists that HRIW accept the waste codes as such.

For purposes of shipping the materials from HRIW to be reclaimed at an approved facility, and according to the definition of solid waste found in 40 CFR 261.2(c)(3) Table 1, commercial chemical products listed in 40 CFR 261.33 (such as U151) are not solid wastes when reclaimed. It would therefore follow that the material is not a hazardous waste when it is to be reclaimed, and the U151 code does not apply. Since the U151 code does not apply, the material may then be shipped to Bethlehem Apparatus for reclamation as an exempt material, or conservatively as D009.

HRIW believes this to be an accurate reading of the definition of solid waste and a legal and plausible way to ship the material to a reputable recycling facility where the mercury may be processed to recover a useable product.

Due to the fact that this reclassification causes a change in the normal "cradle to grave" tracking of this waste stream we ask for your written concurrence with this procedure. As always, HRIW will be pleased to submit any additional information you may need. Please call myself, or Russell Zora at (816) 531-6235.

Sincerely,


Ronald Robertson
Facility Compliance Officer

Post-It™ brand fax transmittal memo 7671 # of pages > 11

To	Ron Smith	From	Teresa Hansen
Co.	KDHE	Co.	KDHE
Dept.	BWM	Phone #	838-1071
Fax #	316-1592	Fax #	



Hazardous Waste Compliance Monitoring and Enforcement Log

RECEIVED
BUREAU OF FORM
A

V 10/6

RJH/SL93

SEP 21 1993

HANDLER

ID NUMBER: **KSD007246846**

LDF () TSF ☒ GEN ☒ KG () SQ () TRA ()
HWM () HWB () UOM () **NOT A GEN**
WASTE MANAGEMENT

HANDLER NAME:

Hydrocarbon Recyclers, Inc

AT **N/A** FT **10/1/93** RCRIS **10/1/93**

STREET:

2549 North New York

CITY: **Wichita 67219**

EVALUATION

New ☐ Followup ☒ Delete ☐

letter to generator dated Sept 9, 1993

Date **9/3/06/30** Agency **S** Type **01** Reason **01** Person **GLP** District **SC**

Areas of Evaluation (EV - Evaluted, NE - Not Evaluated, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other	
GER <input checked="" type="checkbox"/>	GPT <input checked="" type="checkbox"/>	TGR <input type="checkbox"/>		DCH <input checked="" type="checkbox"/>	DGW <input type="checkbox"/>	DMC <input checked="" type="checkbox"/>	DPP <input type="checkbox"/>	CAS <input type="checkbox"/>	
GGR <input checked="" type="checkbox"/>	GRR <input checked="" type="checkbox"/>	TMR <input type="checkbox"/>		DCL <input checked="" type="checkbox"/>	DIN <input type="checkbox"/>	DMR <input checked="" type="checkbox"/>	DSI <input type="checkbox"/>	FEA <input type="checkbox"/>	
GLB <input checked="" type="checkbox"/>	GSC <input type="checkbox"/>	TOR <input type="checkbox"/>		DCP <input checked="" type="checkbox"/>	DLB <input checked="" type="checkbox"/>	DOR <input type="checkbox"/>	DTR <input type="checkbox"/>	ILD <input type="checkbox"/>	
GMR <input checked="" type="checkbox"/>	GSQ <input type="checkbox"/>	TRR <input type="checkbox"/>		DFR <input checked="" type="checkbox"/>	DLF <input type="checkbox"/>	DOT <input type="checkbox"/>	DTT <input type="checkbox"/>		
GOR <input type="checkbox"/>		TWD <input type="checkbox"/>		DGS <input checked="" type="checkbox"/>	DLT <input checked="" type="checkbox"/>	DPB <input type="checkbox"/>	DWP <input type="checkbox"/>		

COMMENTS

IN COMPLIANCE - 93 INSP.

VIOLATION #

New ☐ Change ☒ Delete ☐

Link to:

Comments ☐

Agency **S** Number **0000** Area **DLB** Class **2** Priority **0** Type **SR**

Regulation Citation: **KAR 28-31-14**

Date Determined

Returned to Compliance

MM **06** DD **30** YY **93**

Scheduled: MM **08** DD **16** YY **93**

Actual: MM **06** DD **30** YY **93**

VIOLATION #

New ☐ Change ☐ Delete ☐

Link to:

Comments ☐

Agency **S** Number **0000** Area **000** Class **0** Priority **0** Type **00**

Regulation Citation:

Date Determined

Returned to Compliance

MM **00** DD **00** YY **00**

Scheduled: MM **00** DD **00** YY **00**

Actual: MM **00** DD **00** YY **00**

VIOLATION #

New ☐ Change ☐ Delete ☐

Link to:

Comments ☐

Agency **S** Number **0000** Area **000** Class **0** Priority **0** Type **00**

Regulation Citation:

Date Determined

Returned to Compliance

MM **00** DD **00** YY **00**

Scheduled: MM **00** DD **00** YY **00**

Actual: MM **00** DD **00** YY **00**

VIOLATION #

New ☐ Change ☐ Delete ☐

Link to:

Comments ☐

Agency **S** Number **0000** Area **000** Class **0** Priority **0** Type **00**

Regulation Citation:

Date Determined

Returned to Compliance

MM **00** DD **00** YY **00**

Scheduled: MM **00** DD **00** YY **00**

Actual: MM **00** DD **00** YY **00**

